



UNITED STATES-MEXICO CHAMBER OF COMMERCE CÁMARA DE COMERCIO MÉXICO-ESTADOS UNIDOS

6800 VERSAR CENTER., SUITE 450
SPRINGFIELD, VA 22151
TEL: 703-752-4751 FAX: 703-642-1088

MAIL TO:
P.O. BOX 14414
WASHINGTON, D.C. 20044

BOARD MEMBERS

Honorary President
Amb. Eduardo Medina Mora

Honorary President
Amb. Earl Anthony Wayne

President and CEO
Albert C. Zapanta

Aeromexico Airlines
American Airlines
AS&E
ATT&T
Azteca América
Baker & McKenzie
Banamex
Beirne, Maynard and Parsons
Broad and Cassel
Cemex
Core Logic
Copart, Inc.
Cuéllar Salas y Cuéllar
Steffan, S.C.
Cydsa
Delta Airlines
Dentons
Duane Morris
Duty Free Americas
Exxon/Mobil Corporation
Fedex
Ford Motor Company
Gallástegui Y Lozano, S.C.
General Motors Corporation
Greenberg Traurig, LLC
Gruma
Grupo Carso
Industrias Monterrey, S.A.
Jones Day
Kansas City Southern de México
Korn Ferry
Kraft Foods
Littler
Lucia Oaks
Mary Kay
Mayer, Brown, Rowe & Maw
McDonald's Corporation
MicroTech
Mito Financial LLC
Motorola, Inc.
Naviera Integral
Northrop Grumman (TASC)
Orgain, Bell & Tucker
Padilla Networks LLC
Royal Caribbean Cruises, Ltd.
Ryder Systems, Inc.
Sempra Energy
Seale & Associates
Softtek
State Street
Strasburger & Price, S.C.
Teléfonos de México
The Coca-Cola Company
The Ideatelier
The Woodlands Development Company
Tyson Foods, Inc.
Union Pacific
United Continental Airlines
Verizon
Vitro

June 22, 2015

The Honorable Thomas Wheeler
U.S. Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

GN Docket No. 12-268
WT Docket No. 12-269
AU Docket No. 14-252

Dear Chairman Wheeler:

Since 1973, the United States-Mexico Chamber of Commerce (USMCOC) has served as a bilateral organization to promote trade, investment and joint ventures on both sides of the border between two nations.

Headquartered in Washington, DC, and with 9 offices in the United States, our chapters and local members advocate for common sense government and regulatory policies that promote economic growth for our businesses and communities.

We applaud the Federal Communications Commission (FCC) for your work in promoting a robust communications and technology fields in the United States, and our members appreciate the thoughtful ways that you approach policy decisions that would further impact this important industry sectors.

One of the most important decisions pending before your agency is on developing rules for the next round of spectrum auctions, which will free up more wireless spectrum for consumers and businesses to use.

There is no question that our nation will face a "spectrum crunch" if Americans continue to devour all of the mobile devices and services that we have come to depend on in our daily lives. And with the era of "Internet of Things" coming to us in the very near future, the time is urgent for the federal government to free up more wireless resources.

In order to maximize the amount of spectrum which the private sector can use in the near future, USMCOC believes it is important for the FCC to place competition among all bidders as the primary policy goal. This means that every qualified company should be

able to compete on a level playing field and bid for every market that they are interested in building out their networks to serve customers.

As a binational chamber of commerce, we generally support government set-aside programs that provide contracting opportunities for veteran, minority, women-owned small businesses. But in the case of spectrum auctions, we do not believe it makes sense for the government to set aside certain markets and licenses that only certain companies would be eligible to bid for, unless those companies are clearly recognized to be disadvantaged businesses deserving of special treatment.

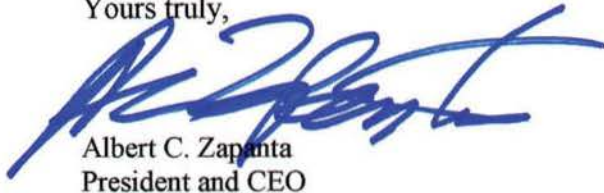
USMCOC is troubled by the results of the most recent FCC auctions where DISH, a giant corporation with billions in assets, took advantage of your agency's "designated entities" rules to game the auctions with a couple of small entity partners. We do not want to see a repeat of such unfair results taking place in the incentive auctions next year.

As you finalize the rules for the next spectrum auction, USMCOC urges you to set aside the least amount of spectrum and markets you can spare for the truly eligible disadvantaged bidders, and leave as much spectrum as possible for the big national players to compete head to head.

As consumers, USMCOC members across the country today can choose between four large and robust mobile companies: AT&T, Sprint, T-Mobile and Verizon. We believe all four of these companies and anyone else who wants to compete with them should be allowed to bid on all of the markets in an open and equal footing, and let the best carrier win.

Thank you for your consideration of our views. USMCOC looks forward to working with you to keep our economy heading in the right direction.

Yours truly,



Albert C. Zapanta
President and CEO